

1 A Yes, ma'am.

2 Q And you looked at all of them?

3 A Yes, ma'am.

4 Q And then you put them back into whatever envelope
5 you got them out of?

6 A Yes, ma'am.

7 Q And you left the client copy envelope with Norma?

8 A Correct.

9 Q And you took the other envelope and left the
10 building and went to the FedEx office?

11 A FedEx or post office. I don't remember how we
12 sent that thing off.

13 Q Okay. And you mailed it to whom?

14 A PCIA.

15 Q Okay. Now, you stated that Norma had told you
16 that they were coming over to your house the following
17 Saturday; is that --

18 A Yes.

19 Q Was it the following Saturday?

20 A This coming Saturday, she said.

21 Q Okay. And who came -- did any of them come over
22 to your house the next Saturday?

23 A Yes. Yes. Norma, Jennifer and Melissa came over.

24 Q Did they have the client copies with them?

25 A Yes.

1 Q So who had the client copies?

2 A Norma had them.

3 Q Okay. Had they been signed?

4 A No.

5 Q Okay. When you picked up the original copies and
6 you said you noticed that each of them was signed; is that
7 correct?

8 A They had a signature, yes, ma'am.

9 Q Okay. Did you ask Norma whether Jennifer had
10 signed this or whether Melissa had signed this? Did you
11 have any conversation about the origin of the signatures on
12 the original copies that you had mailed?

13 A No. I just looked at it, and you know, I assumed
14 at that time that was -- there wasn't any reason to ask that
15 question.

16 Q Okay. So Norma and Melissa and Jennifer come to
17 your house the next Saturday, and Norma brings the client
18 copies?

19 A Correct.

20 Q But they are not signed?

21 A They are not signed.

22 Q What happened then?

23 A Well, we set down. I know they looked at the -- I
24 think they looked at the table I was doing. But they set
25 down at our kitchen table, and that's when we noticed they

1 were not signed, and they spread them out, the client
2 copies. Jim's was there.

3 Q Mm-hmm.

4 A Norma, and I'm trying to remember the sequence of
5 this, Norma signed hers. I took Jim's and we have a copy
6 machine in our house, and I took Jim's and Norma's and when
7 I was going to copy for us, I noticed Norma did not date
8 hers, so I whipped back around, and the girls had just about
9 finished up signing theirs, and I mentioned to Norma that
10 she had not put the date on it. So she put the date on it,
11 and I'm not sure, but I think she put the date on the others
12 also. I'm not sure.

13 Q Okay, what date did she put on it?

14 A I think it was 6-22 or something like that. I
15 think that's when our -- 6-22-96.

16 Q Was that the date -- was that that day's date?

17 A That was that day's date.

18 Q Okay. So she put a different date on it than she
19 would have put on the original?

20 A Yes.

21 Q Okay.

22 A And it wasn't any correlation why to, you know.

23 (Pause.)

24 BY MS. LANCASTER:

25 Q Would you look at Exhibit 19?

1 A Exhibit 19.

2 JUDGE STEINBERG: This one here.

3 MS. LANCASTER: Bates page No. -- 200, you said?

4 MR. KNOWLES-KELLETT: Two hundred.

5 MS. LANCASTER: Bates page No. 200.

6 MR. ROMNEY: Which exhibit? I'm sorry. Nineteen?

7 MS. LANCASTER: Nineteen.

8 MR. ROMNEY: Thank you.

9 (Pause.)

10 BY MS. LANCASTER:

11 Q Found it?

12 A Yes, ma'am. I'm sorry.

13 Q Do you recognize that page?

14 A Yes, ma'am.

15 Q Can you identify it for me?

16 A This is the page in which it appears -- it's got
17 Norma Sumpter's signature, and it's got 6-22-96, and this is
18 a -- I know where that page come from. It went through our
19 copy machine.

20 Q Okay. Did you see Norma Sumpter sign her name on
21 that page?

22 A Yes, ma'am, I seen her sign her name.

23 Q Okay. And did you see her put the date on that
24 date?

25 A Yes, ma'am.

1 Q Okay.

2 A But I was standing up behind her because I had
3 brought back Jim Sumpter's, and we made a copy of his.

4 JUDGE STEINBERG: Let me just -- go to page 198,
5 please. Go to page 198, and look through page 204.

6 (Witness reviews document.)

7 THE WITNESS: Yes, sir.

8 JUDGE STEINBERG: That's the client copy of Norma
9 Sumpter's 1996 application, and this is a copy that you made
10 in your house? It's a copy of a copy you made in your house
11 that day?

12 THE WITNESS: This is a copy of the client's copy.

13 JUDGE STEINBERG: And you said she signed and
14 dated at your house on that --

15 THE WITNESS: 6-22.

16 JUDGE STEINBERG: On 6-22, and you said you had a
17 copy machine in your house?

18 THE WITNESS: Yes, sir.

19 JUDGE STEINBERG: And so the original copy of
20 these pages would have been made by you at your house on
21 that day?

22 THE WITNESS: No, sir. The copy -- the client's
23 copy stayed with -- which would be the original, and we made
24 the xerox copy of the client's copy. Am I --

25 JUDGE STEINBERG: Okay, but pages 198 to 204 are

1 the copy that you made --

2 THE WITNESS: Yes, sir.

3 JUDGE STEINBERG: -- of that client's copy?

4 THE WITNESS: Yes, sir.

5 JUDGE STEINBERG: At least we know one of these
6 things is.

7 THE WITNESS: Beg your pardon, Your Honor?

8 JUDGE STEINBERG: Mr. Romney will tell you later.

9 THE WITNESS: Oh, oh.

10 BY MS. LANCASTER:

11 Q If you will look next at page 206 through 208,
12 specifically I'm interested in page 208.

13 A Yes, ma'am.

14 Q Is that the client's copy that you have been
15 discussing that was executed by Jennifer Hill in your
16 presence?

17 A This is a copy of the client's copy that was
18 executed.

19 Q Okay. You saw Jennifer Hill sign that -- her
20 signature here?

21 A Yes, ma'am.

22 Q And you saw her put the date on it?

23 A No. I did not see her put the date on there. I
24 think Norma put the date on there.

25 Q Okay.

1 A They were already almost through the signing part
2 when I got back with the --

3 Q If you will turn to --

4 JUDGE STEINBERG: But you saw Jennifer Hill pick
5 up a pen and sign this?

6 THE WITNESS: Oh, yes, sir.

7 MS. LANCASTER: Okay.

8 BY MS. LANCASTER:

9 Q If you will turn to page 214 through 216, and pay
10 specific attention to page 216.

11 Is this a copy of the client copy that you
12 personally saw Melissa Sumpter sign on 6-22-96?

13 A Correct.

14 Q And either Melissa Sumpter or Norma Sumpter dated
15 this --

16 A Correct.

17 Q -- document is your testimony?

18 A Correct.

19 Q I'm trying to find Norma's. Hold on.

20 JUDGE STEINBERG: Norma's is 198 to 204, and we
21 did that first.

22 MS. LANCASTER: Oh, we did Norma's already.

23 (Pause.)

24 BY MS. LANCASTER:

25 Q Mr. Brasher, I just noticed, look at page 229, 229

1 of Exhibit 19.

2 A Yes, ma'am.

3 Q Is this the list that you sent to John Black at
4 Spectrum with instructions for him to prepare applications
5 in the names?

6 A This is -- this is the list here. And why it
7 doesn't match the other list, I don't know. But this is the
8 list.

9 Q Okay.

10 JUDGE STEINBERG: Why do you say it doesn't match?

11 THE WITNESS: The other one has two pages with
12 Jennifer on the second page, and that -- why that, if
13 something else might have been needed, I don't -- I don't
14 know.

15 BY MS. LANCASTER:

16 Q The names are all the same; is that correct?

17 A Yes, the names are all the same.

18 Let me look and be sure every name is the same.

19 (Witness reviews document.)

20 Q Okay, I want to go back to the Sumpter
21 applications.

22 As far as you know, Jim Sumpter never signed an
23 application; is that correct?

24 A As far as I know?

25 Q Mm-hmm.

1 A I would not know that.

2 Q Okay. Did Jim Sumpter ever tell you that he
3 signed an application?

4 A Yes, he did.

5 Q When?

6 A In one of the letters in Jim Sumpter's or our
7 exhibits way back in 1998. It was a letter, I think it was
8 dated 12 something of '97.

9 Q Did you ever have any conversations with Jim
10 Sumpter in which Jim Sumpter told you that he had signed an
11 application?

12 A He sent a letter saying so that he signed it.

13 Q No. I asked if you had ever had any conversations
14 with him? Did you ever talk to him and him verbally tell
15 you that he had signed an application?

16 A He -- yes, I told him he signed an application.

17 Q You had a conversation with him?

18 A Yes.

19 Q Okay, when did you have this conversation?

20 A That -- there was a lot of conversations going on
21 about that time, Judy, I mean, whenever the Net Wave came
22 through.

23 Q Mm-hmm.

24 A That's when, and also at the same time they sent
25 him the copies of the material to us, you know, Once they

1 got it from the mail all of the cards and the licenses and
2 everything from they, they were still sent over to us.

3 Q Right. But my question to you, has Jim Sumpter
4 ever admitted to you that he signed, verbally admitted to
5 you that he signed the application that you submitted in his
6 name?

7 A Just outright. No, he never outright said, "I
8 signed that application."

9 Q Okay.

10 A But he signed an application. That what he -- he
11 knew that. I mean, that's what he says.

12 Q Look at Exhibit 39, please turn to Exhibit 39.

13 A What was the exhibit number?

14 Q Thirty-nine.

15 A Oh, over here.

16 Q Right. Exhibit 39, you've found it?

17 A Yes, ma'am.

18 Q Is this a letter that you were just talking about
19 that you had received from Jim Sumpter?

20 A No.

21 Q This is not a letter that you -- did you ever
22 receive this letter from Jim Sumpter?

23 A We received this letter along with three other
24 letters in the same envelope mailed to us.

25 Q And the other letters were from Melissa, Jennifer

1 and Norma?

2 A With the exact same words with different
3 signatures.

4 Q Okay. Now, look at Exhibit 40.

5 A Okay.

6 Q Did you also receive Exhibit 40 from Jim Sumpter?

7 A No, we did not receive that.

8 Q You've never seen this before?

9 A I've seen this before, but we never received it.

10 Q Okay. When is the first time you saw this?

11 A In Sumpter's declaration.

12 Q Okay.

13 A And No. 39 was not in Sumpter's declaration.

14 Q Okay. So was there any other letter that you
15 received from Jim Sumpter wherein he admitted signing the
16 application that was submitted in his name in 1996?

17 A In writing?

18 Q Yes, sir.

19 A No.

20 Q Okay.

21 A Not that I can remember. I don't think so, Judy.

22 Q Okay. Do you have any other documentation from
23 Mr. Sumpter acknowledging that he signed the application
24 that had been submitted in his name?

25 A He signed an assignment and also signed a 800A.

1 Q Okay. FCC forms?

2 A FCC forms, right.

3 Q Okay. All right.

4 (Pause.)

5 BY MS. LANCASTER:

6 Q Turn to Exhibit 38, please.

7 Is that the 800A form that you are stating Jim
8 Sumpter signed?

9 A Yes, which he admitted to in the deposition.

10 Q Okay. Did you see him sign that?

11 A Yes, I did.

12 Q Okay. And who filled out the other handwritten,
13 aside from the signature, who filled out the other
14 handwritten parts of this 800A?

15 A According to Jim's deposition on the end of
16 November, he did.

17 Q Okay. Did you see him fill that information in?

18 A No.

19 Q Okay, but you did see him sign this document?

20 A Correct.

21 Q And did he give this document to you?

22 A Correct.

23 Q Okay.

24 A And we asked to make a copy of the document.

25 Now, I do not know if we mailed this document or

1 Sumpter mailed it, but I had a copy.

2 Q Okay. Did you present this document to him for
3 his signature?

4 A No.

5 Q He just presented it to you?

6 A Yes.

7 Q Had you seen it prior to him presenting it to you?

8 A No.

9 Q Okay. The 800A basically is what's called a
10 construct -- a construct letter saying that the station has
11 been constructed; is that correct?

12 A Yes, ma'am.

13 Q Okay. What other form did you say -- oh, the
14 assignment is the other --

15 A That's right.

16 Q -- form that you said that --

17 A Assigning the frequency over to DLB.

18 Q Let me see if I can find it. Hold on.

19 (Pause.)

20 BY MS. LANCASTER:

21 Q Would you turn to Exhibit 20?

22 Exhibit 20 is an application filed -- an
23 application in which lists the applicant as DLB Enterprises.
24 Hold on.

25 MR. ROMNEY: What number are we at, please?

1 MS. LANCASTER: Twenty.

2 MR. ROMNEY: Okay.

3 BY MS. LANCASTER:

4 Q Page 17 of that exhibit is an assignment of
5 authorization form which appears to be signed by Jim Sumpter
6 and dated 1-28-98.

7 Is this the assignment that you are talking about?

8 A Correct.

9 Q Did you see Jim Sumpter sign this document?

10 A Yes, I did.

11 Q Did you present it to him for his signature?

12 A Yes, we did. I did.

13 Q Okay, so you filled out everything except for the
14 signature itself and the date next to the signature?

15 A All that was typed in by Kathy at Schwaninger's
16 for us. They typed up the whole form for us.

17 Q Okay.

18 A We did not type it.

19 Q But it was done at your direction; is that
20 correct?

21 A Yes, that's correct.

22 Q Okay. While we are in this exhibit, let's go
23 ahead and look at the other assignments that are in here.
24 If you go to -- well, at least for the Sumpters. If you
25 look on page 16, there is another assignment where the

1 assignor is Jennifer Hill.

2 A Correct.

3 Q Did you have this assignment form prepared and
4 presented to Jennifer Hill for her signature?

5 A We gave all four of these to Norma at Sumpster's
6 accounting.

7 Q Okay. Did you see Jennifer Hill sign this form?

8 A No.

9 Q Did you -- the form was given back to you though;
10 is that correct?

11 A Correct, it was.

12 Q Okay. On page 18, there is an assignment
13 authorization where the assignor is Melissa Sumpster.

14 You also had this form prepared for Melissa?

15 A Correct.

16 Q Did you see Melissa sign it?

17 A No.

18 Q Was it given back to you after it had been signed?

19 A Correct.

20 Q When you handed it to Norma, the signature section
21 of this form was blank; is that correct?

22 A It was blank.

23 Q Okay. Page 19 is an assignment of authorization,
24 the assignor is Norma Sumpster.

25 The same facts true, you had this form drafted for

1 Norma's signature?

2 A Correct.

3 Q You gave it to Norma with the signature line
4 blank?

5 A Correct.

6 Q And did you see Norma sign it?

7 A Correct.

8 Q Okay, did you --

9 JUDGE STEINBERG: Wait. What's correct?

10 THE WITNESS: I did see Norma sign it.

11 JUDGE STEINBERG: You did see her sign it.

12 BY MS. LANCASTER:

13 Q And did you see her put the date on it?

14 A Yes.

15 Q Okay.

16 JUDGE STEINBERG: With respect to page 17, which
17 was the Jim Sumpter assignment authorization, where were you
18 when you -- I mean, you said you saw him sign this?

19 THE WITNESS: Yes, sir.

20 JUDGE STEINBERG: Where were you when he signed
21 it?

22 THE WITNESS: We were in Jim Sumpter's office.

23 JUDGE STEINBERG: And did Jim and Norma both sign
24 theirs together --

25 THE WITNESS: Yes, both at the same time.

1 JUDGE STEINBERG: -- at the same time?

2 THE WITNESS: Yes.

3 JUDGE STEINBERG: And you and Pat were present?

4 THE WITNESS: Yes, sir.

5 BY MS. LANCASTER:

6 Q Let's go back to Norma Sumpter's license.

7 A Where are we?

8 Q Exhibit 44.

9 MR. ROMNEY: Exhibit 44?

10 MS. LANCASTER: Yes.

11 MS. LANCASTER: Is the license that was issued in
12 the name of Norma Sumpter.

13 MR. ROMNEY: Well, that's wrong.

14 JUDGE STEINBERG: That's the 1993.

15 MS. LANCASTER: Oh, I don't want that one. Hold
16 on.

17 MR. KNOWLES-KELLETT: You want page 14 of Exhibit
18 45.

19 MS. LANCASTER: Page 14 of Exhibit 45 I'm told is
20 the one I want.

21 MR. ROMNEY: page 14?

22 MS. LANCASTER: Yes, Attachment D. Is a licensed
23 issued to Norma Sumpter for Station WPJR739, and that was
24 issued on 9-25-1995.

25 JUDGE STEINBERG: Six.

1 MR. ROMNEY: Excuse me?

2 MS. LANCASTER: 1996. I'm sorry. Can't read.

3 THE WITNESS: What page are we --

4 MS. LANCASTER: You're on Exhibit 45, page 14.

5 THE WITNESS: Correct. All right, I'm there.

6 BY MS. LANCASTER:

7 Q Did you receive the license -- do you have this
8 license?

9 A No, I only have a copy.

10 Q Has anyone told you that they have the original
11 license?

12 A I assume Norma and them have it because I got a
13 copy sent to me --

14 Q Okay.

15 A -- from their office.

16 Q But did Norma ever tell you that they have this
17 license?

18 A Yes.

19 Q When did she tell you that?

20 A When she received it, and what she did she called
21 and told Pat that she had the license, and we told her to
22 put it -- Pat told her to put it in with the mail, the stuff
23 that we're going to be picking up, or sent to us, and that's
24 the way we got this stuff back and forth.

25 Q Right. Okay. She said -- as I understand it,

1 Norma called Pat and said she had gotten, did she
2 specifically say the license from the FCC?

3 A Yes.

4 Q Had she opened the envelope containing the
5 license?

6 A I would have to assume she would.

7 JUDGE STEINBERG: Okay, you don't know?

8 THE WITNESS: I don't know.

9 MS. LANCASTER: But you don't know. Don't assume
10 for me. Tell me whether you know or you don't know.

11 THE WITNESS: No, I don't know.

12 JUDGE STEINBERG: And were you part of the
13 telephone conversation?

14 THE WITNESS: No.

15 JUDGE STEINBERG: So whatever you know Pat told
16 you?

17 THE WITNESS: Yes, sir.

18 MS. LANCASTER: Your Honor, I am going to object
19 to hearsay on all of this but --

20 JUDGE STEINBERG: Oh, sure, so can I.

21 MS. LANCASTER: -- it's -- you know.

22 MR. ROMNEY: Except you have asked the questions.

23 JUDGE STEINBERG: I know.

24 MR. ROMNEY: You've opened the door, and what
25 you've opened the door you can't object.

1 JUDGE STEINBERG: That's right.

2 MS. LANCASTER: It's not really, you know --

3 MR. ROMNEY: Oh, I've had that rule before. I've
4 made the mistake. I'm sorry.

5 MS. LANCASTER: -- a problem as far as I'm
6 concerned.

7 BY MS. LANCASTER:

8 Q Based upon what Pat told you, you believe that
9 Norma received this license in the mail, and then forwarded
10 it to you; is that correct?

11 A A copy of the license.

12 Q Okay, she forwarded a copy to you, not the
13 original license?

14 A Correct.

15 Q Okay, that's what I was trying to understand.

16 JUDGE STEINBERG: Now, the purpose of my question
17 was not to raise any kind of hearsay objection. It was just
18 to find out the basis of the witness's knowledge, and that
19 goes to the weight.

20 MR. ROMNEY: I have no problem with that.

21 JUDGE STEINBERG: And so you know, I wasn't being
22 a wise guy.

23 MR. ROMNEY: No, no, I understand that.

24 JUDGE STEINBERG: I can be, but not today.

25 MR. ROMNEY: A judge is supposed to be a wise man,

1 not a wise guy.

2 JUDGE STEINBERG: No, the wise guy is more apropos
3 given -- never mind.

4 BY MS. LANCASTER:

5 Q Mr. Brasher, when you first talked with Norma
6 about obtaining a license, did you have any conversations
7 with her about that she would have to put up any money to
8 construct the station?

9 A No. No.

10 Q Did you have any conversations with her that she
11 would have to pay any operating expenses for the station?

12 A The -- the conversation about compensation --
13 about what she would have to do and everything, not that I
14 remember about what you just asked about compensation and
15 stuff like that. She had stated ahead of time that she
16 wanted to try to clear her debt off, you know, and that
17 conversation, that would be considered conversation if we
18 want it to, but --

19 Q Did you tell -- I'm sorry.

20 Did you tell Norma Sumpter that she would be
21 responsible for paying any of the operating fees associated
22 with the license in her name?

23 A No.

24 Q Did you tell Norma Sumpter that she would be
25 responsible for paying any costs associated with purchasing

1 equipment that would be used to make her station operable?

2 A Not that I --

3 Q Repeaters or --

4 A Not that I remember, no.

5 Q No. Okay.

6 Would that be true for all of the Sumpters'? You
7 didn't have any of those conversations with Jim either, did
8 you, on any of those subjects?

9 A No, not that I -- not that I remember.

10 Q You didn't talk to --

11 A Definitely not to the girls.

12 Q Okay, did not talk to the girls. Okay.

13 A Most of the stuff carried through Norma. Norma
14 was basically the contact. She is always at the office,
15 always, you know.

16 Q During the length of time that Norma, and you can
17 answer this -- it might speed it up a little bit -- on any
18 of the Sumpters -- has DLB and/or Metroplex ever sent any
19 type of accounting statement to any of the Sumpters
20 regarding revenue, expenses and profit that may have been
21 generated as a result of any of the Sumpters' stations?

22 A Yes, because we send -- the accounting firms --
23 Sumpter's accounting firm set up the books and controls, how
24 the T-band information was coming through. We sent that
25 every month to them, and they had that accounting where they

1 could see what happened to -- each customer has been added,
2 the dates, the amount of monies, and with the books set up
3 by the Sumpters, it would be very easy for them to deduct
4 what was happening.

5 Q It's my understanding that the documents that you
6 provided to the Sumpter accounting firm as your accountant
7 did not break out any of those particular categories by
8 station; is that correct?

9 A By individual stations?

10 Q Yes.

11 A But by sites and how much by sites and everything
12 else, it did.

13 Q Okay. But there are other stations located at the
14 Allen, Texas site, aren't there?

15 A But they are broken down. Like for example, Allen
16 site, it -- it tells exactly what the Allen site accounting
17 is.

18 Q Correct. But there are other stations aside from
19 the Sumpter stations that are located at the Allen site?

20 A Yes.

21 Q Okay. So there was nothing given to any of the
22 Sumpters that would indicate what their station was bringing
23 in in revenue or expending in expenditures?

24 A Indirectly, they can.

25 Q Okay, so they would have to go through all of the

1 paper work that you supplied to them on a monthly basis to
2 try to determine that?

3 A That they went through anyway.

4 Q Okay. At the time that you were supplying this
5 paper work -- well, let's see. Up and through 1997, I
6 believe you -- when did Mr. Sumpter resign as your
7 accountant? Was it 1997?

8 A Yes, ma'am; a few days before the end of 1997.

9 Q Okay. Did Jennifer Hill work in his office in
10 1997?

11 A I would say she had another job. But knowing the
12 situation there, she probably worked there also on the
13 weekends and different times.

14 Q Do you know of your own personal knowledge that
15 Jennifer Hill continued to work in Jim Sumpter's office in
16 1997?

17 A Yes.

18 Q Of your own personal knowledge you know that?

19 A I've seen them on a Saturday, or in there on a
20 Saturday.

21 Q Okay. How about Melissa Sumpter, do you have
22 personal knowledge whether or not Melissa Sumpter worked in
23 Jim Sumpter's office in 1997?

24 A I've seen her in 1997 in Jim Sumpter's work in
25 that area.

1 Q Okay, when you say you saw Melissa Sumpter working
2 Jim Sumpter's office, what was she doing?

3 A She was doing paper work and filing and doing like
4 fill in on the front desk and working with the -- with Norma
5 through this, only at the time I've seen her.

6 Q Okay.

7 A She might have been doing other things which I
8 don't know.

9 Q Okay. And Jennifer Hill, when you saw her there
10 at Jim Sumpter's office on a Saturday in 1997, what was she
11 doing?

12 A She was at a computer in one of the office areas.

13 Q You have no personal knowledge as to what the
14 exact duties of Melissa or Jennifer were on those particular
15 times that you saw there; is that correct?

16 A That's correct.

17 Q And how many times in 1997 did you see them there?

18 A That would be difficult because I don't always
19 visit them every day so I --

20 Q I just asked how many times you saw them.

21 A That I cannot -- I do not remember.

22 Q One time each?

23 A A couple of times.

24 Q A couple of times each --

25 A Yeah, or more.

1 Q -- in 1997?

2 A Yeah.

3 Q And it is your position that any notice that would
4 have been received by any of the Sumpters as to the
5 revenues, expenses and profits regarding each of their
6 stations would have had to -- they would have had to have
7 learned about that through all of the documentation that you
8 dropped off at Jim Sumpter as your accountant from DLB?

9 A No. When they dropped it off -- we dropped it
10 off, they had set up the book how to record all this to make
11 the statements that come back to us. They knew exactly, if
12 they key this document in, knew exactly where it goes to our
13 forms that they sent back to us. They knew exactly where
14 everything went on those documentation that the accounting
15 department did.

16 Q Okay. And the monthly documents that you dropped
17 off, it's my understanding they encompassed all of your
18 revenue and all of your expenditures for the whole company,
19 DLB and/or Metroplex; is that correct?

20 A That's correct.

21 Q Okay. The information regarding the Sumpters'
22 licenses was not in any way separated out in a separate
23 package or anything when you took it over to the Sumpters,
24 was it?

25 A We did not subdivide it.